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5 Attorney for Defendant

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                    UNITED STATES DISTRICT COURT
7
                        DISTRICT OF NEVADA
8
   UNITED STATES OF AMERICA,   )
9   )
                     Plaintiff,   )
10   )   2:20–cr-00265-JCM-BNW
   vs.   )
11   )
   ZACHARY SANNS,   )   **STIPULATION TO MODIFY**
12   )   **TERMS OF PRETRIAL**
                     Defendants.   )   **RELEASE**
13 _____)

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15   **IT IS HEREBY STIPULATED AND AGREED,** by and between Nicholas A.

16 Trutanich, United States Attorney, and Christopher Burton, Assistant United States Attorney,

17 counsel for the United States of America, and David T. Brown, counsel for defendant, that the

18 defendant, Zachary Sanns be permitted to travel freely from New Jersey, New York,

19 Pennsylvania, Connecticut and Nevada.

           This stipulation is entered into for the following reasons:
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           1.   At the time of Mr. Sanns' Detention pretrial services included a travel restriction
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    as one of the conditions in their recommendation of pretrial release.
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           2.   Mr. Sanns agreed to this condition as he planned to reside in Nevada while he
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    awaits trial.
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           3.   On or about August 19, 2020, the parties entered a stipulation for Mr. Sanns to
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    relocate to Beachwood, New Jersey and move in with his father.
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           4.   That stipulation was approved by the Court and Mr. Sanns has relocated to New
27
    Jersey.
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5.   Mr. Sanns lives close to the border of several states and has family and friends in New York, Pennsylvania and Connecticut and would like the ability to see them and to visit those states.

6.   Mr. Sanns trial has just been continued 6 months and would like the ability to see his family while he awaits trial.

7.   Mr. Sanns has followed all directive of pretrial release and been in regular contact with the undersigned.

8.   U.S. Pretrial Services Officer Alicia Coughlin has indicated that she has no objection to this modification.

    DATED this 18th day of November, 2020.

                                    /s/
                                    DAVID T. BROWN, ESQ.
                                    Counsel for Defendant

                                    /s/
                                    CHRISTOPHER BURTON, ESQ.
                                    United States Attorney

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

10   UNITED STATES OF AMERICA,   )
)
11   Plaintiff,   )   2:20–cr-00265-JCM-BNW
)
12   vs.   )
)   **FINDINGS OF FACT, CONCLUSIONS**
13   ZACHARY SANNS,   )   **OF LAW, AND ORDER**
)
14   Defendants.   )
)
15

16   **FINDINGS OF FACT**

17   Based on the pending Stipulation of counsel, and good cause appearing therefore, the

18   Court finds that:

19   1.   When the Court ordered Defendant released pending trial, the Court

20   imposed a travel restriction as one of his conditions of release. Docket No. 7 at 3.

21   2.   The Court also ordered Defendant to maintain residence at his current

22   address in Nevada. Id.

23   3.   On or about August 19, 2020, the parties entered a stipulation for Mr. Sanns to

24   relocate to Beachwood, New Jersey and move in with his father.

25   4.   That stipulation was approved by the Court and Mr. Sanns has relocated to New

26   Jersey.

27   5.   Mr. Sanns lives close to the border of several states and has family and friends in

28   New York, Pennsylvania and Connecticut and would like the ability to see them and to visit

1   those states.

2   6. Defendant's trial has just been continued 6 months and would like the ability to see

3   his family while he awaits trial.

4   7. Mr. Sanns has followed all directive of pretrial release and been in regular contact

5   with the undersigned.

6   8. U.S. Pretrial Services Officer Alicia Coughlin has indicated that she has no

7   objection to this modification.

8   <div align="center">**ORDER**</div>

9   **IT IS HEREBY ORDERED** that Zachary Sanns' travel restriction is modified to

10   permit him to travel to Nevada, New Jersey, New York, Pennsylvania, and Connecticut.

11   All other conditions of pre-trial release shall remain.

12   **DATED** this 19th day of November , 2020.

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14   THE HONORABLE NANCY J. KOPPE
                  United States Magistrate Judge

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